

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 09-10391-DPW-1
	)	
RALPH F. DELEO,	)	
	)	
Defendant.	)	

**GOVERNMENT'S MOTION FOR EXTENSION OF TIME**

The United States, by and through its undersigned attorneys, hereby moves for an extension of time to November 19, 2015, to file an answer or other responsive pleading to the defendant's motion to vacate, set aside or correct sentence. In support thereof, the government states:

1. On September 10, 2015, the Court served a copy of the defendant's petition on the government and ordered the government to file an answer within 21 days, which is October 1, 2015.

2. The defendant's petition presents several issues regarding his attempt to vacate his plea and conviction. The government requests additional time in which to prepare its response.

3. Undersigned counsel for the government will also be in trial, starting November 2, 2015 and expected to last two weeks. United States v. Christlee Fils-Aime, Cr. No. 13-10282-DJC-1. Accordingly, the government requests an extension until the week after the trial.

4. This is the government's first request for an extension of time.

WHEREFORE, the government respectfully requests that the Court extend the time for the filing of its answer or other responsive pleading to the defendant's motion to vacate, set aside or correct sentence, to November 19, 2015.

Respectfully submitted,

CARMEN M. ORTIZ  
United States Attorney

By: /s/ Timothy E. Moran  
TIMOTHY E. MORAN  
Assistant U.S. Attorney

Date: September 30, 2015

CERTIFICATE OF SERVICE

I hereby certify that this motion filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and sent by first class mail to the following:

Ralph F. DeLeo  
Prisoner No. 36950-038  
FCI-Allenwood Med.  
P.O. Box 2000  
White Deer, PA 17887.

By: /s/ Timothy E. Moran  
TIMOTHY E. MORAN